

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

18 U.S.C. § 1343 - Wire Fraud

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: 20 years imprisonment;
 \$250,000 fine;
 3 years supervised release; and
 \$100 special assessment and restitution as determined by the Court

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DEFENDANT - U.S.

Christopher Michael Gerrans

DISTRICT COURT NUMBER

CR 19 327

DEFENDANT**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned)

Robin L. Harris

IS NOT IN CUSTODY
 Has not been arrested, pending outcome this proceeding.
☒ If not detained give date any prior
 summons was served on above charges

☐ 3) Is on Bail or Release from (show District)
IS IN CUSTODY
☐ 4) On this charge

☐ 5) On another conviction

☐ Federal ☐ State

☐ 6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed

 DATE OF
 ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

 DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

JUL 23 2019

INFORMATION

3. In approximately May 2014, GERRANS took over the accounting duties for Sanovas. In connection with performing accounting duties for Sanovas, GERRANS assumed responsibility for entering transactions into Quickbooks, which was accounting software used by Sanovas, including payments and accounts payable relating to goods and services purchased by Sanovas.

COUNT ONE: (18 U.S.C. § 1343 – Wire Fraud)

Paragraphs 1 through 3 of this Information are re-alleged and incorporated as if fully set forth here.

Beginning on or about July 2014 and continuing through at least on or about December 2017, in the Northern District of California, the defendant,

CHRISTOPHER MICHAEL GERRANS, knowingly and with the intent to defraud participated in, devised, and intended to devise a scheme and artifice to defraud as to a material matter, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by means of omission and concealment of material facts.

THE SCHEME AND ARTIFICE TO DEFRAUD

Using his position at Sanovas and his control over the Quickbooks accounting records, GERRANS devised a scheme to embezzle investor funds from Sanovas to enrich himself. The scheme included GERRANS making false entries in Sanovas' Quickbooks software. These false entries gave the appearance that expenses for goods and services had been incurred by Sanovas and that checks were issued to pay for these goods and services. In truth and fact, no payments were made to the recipients identified in the false entries, and GERRANS caused checks, corresponding to the false Quickbook entries, to be made payable to himself. GERRANS thereafter deposited these checks to his personal bank account and used the funds for his personal expenses.

THE INTERSTATE WIRE TRANSMISSION

On or about January 12, 2015, in the Northern District of California, for the purpose of executing the aforementioned scheme and artifice to defraud, the defendant,


CHRISTOPHER MICHAEL GERRANS, did knowingly transmit and cause to be transmitted, in interstate and foreign commerce, by means of a

1 wire communication, certain writings, signs, signals, pictures, and sounds, specifically, an image of
2 check number 7176, drawn on a Sanovas account and made payable to Chris Gerrans, in the amount of
3 \$11,973.55, by depositing it into an Automated Teller Machine (ATM) in Novato, California, which
4 caused the image to be transferred by wire to a processing center outside the State of California.

5 All in violation of Title 18, United States Code, Section 1343.

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7 Dated: July 23, 2019

8 DAVID L. ANDERSON
9 United States Attorney

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11 ROBIN L. HARRIS
12 LLOYD FARNHAM
13 Assistant United States Attorneys
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